

## REMARKS

Claims 1-19 and 34-43 are pending in the application. Claims 20-33 are withdrawn. Claims 1-19, and 34-43 are rejected.

There are no amendments to the claims.

As discussed below, all of the claims are in condition for allowance. **But if after considering this response, the Examiner does not allow all of the claims, then the Applicant's agent requests that the Examiner contact him to schedule and conduct a telephone interview before issuing a subsequent office action.**

### **Rejection of Claims 1-13, 15-18, and 34-42 Under 35 U.S.C. § 102(e) Over Cannon (U.S. Pat. No. 6,842,447)**

#### **Claim 1.**

Claim 1 recites a gateway including an IP port for coupling to an IP network device, one or more handset ports for coupling to non-IP digital PBX telephone handsets, and a protocol translator circuit for translating call control signals between the handset ports and the IP port.

For example, FIG. 1A shows a remote handset gateway 11 that includes handset ports coupled to traditional (non-IP) digital handsets 10 and an IP port for coupling to an IP call controller 12. A block diagram of an internal structure is also shown in FIG. 2 showing handset ports 31 and an IP port 39.

In contrast, Cannon does not disclose a remote handset gateway that includes both handset ports and an IP port. Since there is no gateway that connects to both remote handsets and an IP port, Cannon also does not disclose a protocol translator circuit for translating call control signals to and from non-IP digital PBX handsets and IP.

Cannon's handsets 31 are connected to a PBX 33. The PBX 33 is connected to an enterprise gateway 35. Cannon states that the structure and operation of the enterprise gateway 35 is similar to that of the PSTN/IP gateways 29. Cannon's PSTN/IP gateways 29, in-turn, receive PSTN signals through a switch 27 and convert them to IP signals for delivery to the IP network 13. Therefore, Cannon's enterprise gateway 35 must connect to IP signals on the network side and PSTN signals to the

PBX. Therefore, Cannon's PBX communicates with the enterprise gateway 35 via PSTN signals.

Thus Cannon's PBX 33, which includes handset ports, outputs PSTN signals to the Enterprise gateway 35, and is not disclosed to output IP signals across an IP port. Cannon's enterprise gateway 35 outputs IP signals across an IP port (to the customer intranet 37) but is not connected to telephone handsets and therefore is not disclosed to include handset ports. Since the call control signals to and from the handset ports are translated by the PBX into PSTN signals rather than IP signals, Cannon also does not disclose a protocol translator circuit for translating call control signals between the handset ports and the IP port.

Therefore, Cannon does not disclose or reasonably suggest all the limitations of claim 1, and claim 1 is allowable over Cannon.

**Claims 2-13.**

Claims 2-13 are allowable by virtue of their dependence from claim 1.

**Claim 15.**

Claim 15 recites a gateway coupled both to non-IP digital PBX telephone handsets and to an IP network, and a remote IP call controller.

For example, FIG 1A shows a gateway 11 coupled to a remote IP call controller 12.

In contrast, by reasoning described above with respect to claim 1, Cannon does not disclose a gateway that is coupled to both non-IP digital PBX telephone handsets and to an IP network.

Therefore, Cannon fails to disclose or reasonably suggest all the limitations of claim 15, and claim 15 is allowable over Cannon.

**Claim 16.**

Claim 16 is allowable by virtue of its dependence from claim 15.

**Claim 17.**

Claim 17 is allowable for reasons similar to those given for claim 15.

**Claim 18.**

Claim 18 is allowable by virtue of its dependence from claim 17.

**Claim 34.**

Claim 34 is allowable for reasons similar to those given for claim 1. Specifically, Cannon does not disclose or reasonably suggest translating non-IP digital PBX telephone call control signals to and from IP telephone call control signals.

**Claims 35-42.**

Claims 35-42 are allowable by virtue of their dependence from claim 34.

**Rejection of Claims 14, 19, and 43 Under 35 U.S.C. § 103(a) Over Cannon In  
View of Bailis (WO 00/11818)**

Claims 14 and 43 are allowable by virtue of their respective dependencies from claims 1 and 34.

**Claim 19.**

Claim 19 recites a plug in card coupled to a proprietary IP telephone call controller and also coupled to non-IP digital PBX handsets, and a protocol translator circuit for translating non-IP digital call control signals to and from IP call control signals.

For example FIG. 1C shows a handset gateway card 40 so configured.

In contrast Cannon, for reasons described above in conjunction with claim 1, does not disclose a protocol translator circuit for translating non-IP digital call control signals to and from IP call control signals.

Bailis also does not disclose a protocol translator circuit for translating non-IP digital call control signals to and from IP call control signals.

Therefore, Cannon and Bailis, alone and in combination, fail to disclose or reasonably suggest all the limitations of claim 19, and claim 19 is allowable over Cannon in view of Bailis.

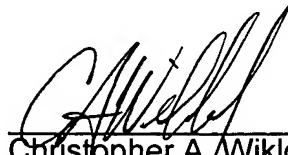
Should any additional fees be required, please charge them to Deposit Account No. 07-1897.

If the Examiner believes that a telephone interview would be helpful, he is respectfully requested to contact the Applicant's agent at (425) 455-5575.

Dated this 21<sup>st</sup> day of December, 2007.

Respectfully submitted,

GRAYBEAL JACKSON HALEY LLP

A handwritten signature in black ink, appearing to read 'C. Wiklof', is written over a horizontal line.

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